

**BECK & LEE BUSINESS TRIAL LAWYERS**

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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

JENNIFER RED and REBECCA  
YUMUL, on Behalf of Themselves and  
All Others Similarly Situated,

Plaintiffs,

vs.

THE KROGER CO.,

Defendant.

Case No.: 2:10-CV-01025-DMG-MAN  
Pleading Type: Class Action

**BECK & LEE BUSINESS TRIAL  
LAWYERS' OPPOSITION TO NOTICE OF  
TERMINATION OF BECK & LEE BY  
PLAINTIFFS JENNIFER RED AND  
REBECCA YUMUL AND [PROPOSED]  
ORDER & NOTICE OF FILING RELATED  
EXHIBITS**

Judge: Hon. Dolly M. Gee

1           The Notice of Termination of Beck & Lee by Plaintiffs Jennifer Red and  
2 Rebecca Yumul and [Proposed] Order (“Termination Notice”) [D.E. 44] filed by  
3 The Weston Firm (“Weston”) on August 16, 2010, is part of an invalid and  
4 improper attempt to terminate Beck & Lee in each of the firms’ jointly prosecuted  
5 class actions. It was filed in retaliation for Beck & Lee’s investigating  
6 information that Weston inappropriately recruited a class action plaintiff through  
7 offer of a “kickback” and employment of a runner/capper, and illegally promised  
8 to split settlement proceeds with Weston’s non-lawyer employees.

9           The relevant facts are set forth in papers filed on August 18, 2010, and  
10 attached hereto, in another consumer class action jointly prosecuted by Weston and  
11 Beck & Lee, *Red et al. v. Unilever United States, Inc. et al.*, No. 5:10-cv-00387-  
12 JW (N.D. Cal.) (“*Unilever*”), currently pending before the Honorable James Ware:

- 13           • Beck & Lee Business Trial Lawyers’ Opposition to Notice of  
14 Termination of Beck & Lee and Reese Richman LLP by Plaintiffs  
15 Evangeline Red, Jennifer Red, and Rachel Whitt and [Proposed]  
16 Order (**Exhibit 1** hereto);
- 17           • Declaration of Elizabeth Lee Beck in Support of Beck & Lee Business  
18 Trial Lawyers’ Opposition to Notice of Termination of Beck & Lee  
19 and Reese Richman LLP by Plaintiffs Evangeline Red, Jennifer Red,  
20 and Rachel Whitt and [Proposed] Order (**Exhibit 2** hereto);
- 21           • Declaration of Jared H. Beck in Support of Beck & Lee Business Trial  
22 Lawyers’ Opposition to Notice of Termination of Beck & Lee and  
23 Reese Richman LLP by Plaintiffs Evangeline Red, Jennifer Red, and  
24 Rachel Whitt and [Proposed] Order (with attachments) (**Exhibit 3**  
25 hereto); and
- 26           • Notice of Filing Declaration of Alejandro Gutiérrez in Support of  
27 Beck & Lee Business Trial Lawyers’ Opposition to Notice of  
28 Termination of Beck & Lee and Reese Richman LLP by Plaintiffs

